Jennifer Pasquarello, Pro Se, # 558110E Michelle Angelina, Pro Se, #339899C Edna Mahan Correctional Facility 30 County Route 513 Clinton, New Jersey 08809-4004

RECEIVED

## UNITED STATES DISTRICT COURT

For the District of New Jersey Vicinage of Trenton

DEC 0 6 2029

ZNO-DEA

------JENNIFER PASQUARELLO,

MICHELLE ANGELINA,

On Behalf of Themselves and All :

Other Similarly Situated Women, : CIVIL ACTION NUMBER: 3:21-cv-18806-Pro Se PLAINTIFFS

VS.

Ms. KUHN, AL KANDELL, PATRICIA McGILL, DEMETRIUS MINOR, CARLOS MARTINEZ, DEFENDANTS

PHIL MURPHY, MARCUS HICKS/ : REQUEST FOR ENTRY OF DEFAULT

: JUDGMENT

To: Clerk of the Court

Plaintiff(s) Jennifer Pasquarello and Michelle Angelina requests that you enter judgment in default based upon the attached affidavit against defendant(s) \_\_ Demetrius Minor and Carlos Martinez in the above captioned matter for the amount of \$ 10,000.00 plus interest at the rate of 10% and costs in the amount of \$.25.00.

Jennifer Pasquarello, Pro Se, # 558110E Michelle Angelina, Pro Se, #339899C Edna Mahan Correctional Facility 30 County Route 513 Clinton, New Jersey 08809-4004

## UNITED STATES DISTRICT COURT

For the District of New Jersey Vicinage of Trenton

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JENNIFER PASQUARELLO, MICHELLE ANGELINA, On Behalf of Themselves and All : Other Similarly Situated Women, : CIVIL ACTION NUMBER: 3:21-cv-18806-Pro Se PLAINTIFFS

ZNQ-DEA

VS.

: STATE COURT DOCKET: HNT-L-000273-21

PHIL MURPHY, MARCUS HICKS/ Ms. KUHN, AL KANDELL, PATRICIA McGILL, DEMETRIUS MINOR, CARLOS MARTINEZ, DEFENDANTS

: CERTIFICATION IN SUPPORT OF : REQUEST FOR ENTRY OF DEFAULT

JUDGMENT

Plaintiff(s) Jennifer Pasquarello and Michelle Angelina, being duly sworn, depose(s) and state(s) as follows:

- (1) I/We am/are the pro se plaintiff in the above-captioned matter, and make this certification in support of my application for default judgment against defendants
- (2) On the date of August 11, 2021, defendant(s) \_\_\_\_Carlos Martinez\_ (and) Demetrius Minor , respectively, were served with a copy of the complaint and summons in this civil action. I/We have annexed a copy of the return of service completed by the Hunterdon County Sheriff as exhibit A.
- (3) The defendant(s) Carlos Martinez and Demetrius Minor has/have failed to file an answer or otherwise defend this action despite the fact that more than 35 days have now elapsed since

service of the complaint and summons upon them. As of the date of September 27, 2021, a total of 48 days. As of the date of October 27, 2021, a total of 78 days have elapsed.

- (4) Under New Jersey Court Rule 4:6-1 defendant(s) is/are required to file and serve an answer within thirty-five (35) days of service of the complaint and summons upon them. Under Fed.R.Civ.P. 12(a)(1)(A), defendants are required to file and serve an Answer to the Complaint within twenty (20) days of being served. The defendant(s) \_\_\_\_\_ Carlos \_\_\_\_\_ Martinez \_\_\_\_\_ (and) \_\_\_\_\_ Demetrius Minor \_\_\_\_\_\_ have failed to comply with either the state rule or the federal rule, and have offered no explanation for their failure to file any pleadings.
- (5) Under Fed.R.Civ.P. 55(b), the clerk of the U.S. District Court is empowered to enter a default judgment against a non-responding party when the plaintiff's claim against that defendant is for a sum certain. Default judgment may be entered when the party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend the action.
- (5) Pursuant to New Jersey Court Rule 4:43-2 and Fed.R.Civ.P. 55(b), I/we am/are hereby requesting that the clerk enter a default judgment for a sum certain in the amount of \$10,000 plus costs in the amount of \$25.00 against each defendant on behalf of the plaintiffs.

## CERTIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 11/28, 20 21

Dated: 1/28, 20 21

Jegnifer Pasquarello, Pro Se Plaintiff

Michelle Angelina, Pro Se Plaintiff

Jennifer Pasquarello, Pro Se, # 558110E Michelle Angelina, Pro Se, #339899C Edna Mahan Correctional Facility 30 County Route 513 Clinton, New Jersey 08809-4004

## UNITED STATES DISTRICT COURT

For the District of New Jersey Vicinage of Trenton

JENNIFER PASQUARELLO,

MICHELLE ANGELINA,

On Behalf of Themselves and All :

Other Similarly Situated Women, : CIVIL ACTION NUMBER: 3:21-cv-18806-

Pro Se PLAINTIFFS

ZNO-DEA

VS.

STATE COURT DOCKET: HNT-L-000273-21

PHIL MURPHY, MARCUS HICKS/

Ms. KUHN, AL KANDELL,

PATRICIA McGILL, DEMETRIUS

MINOR, CARLOS MARTINEZ,

DEFENDANTS

PROOF OF SERVICE

I/We certify that on the date of November 30 , 2021, I/we did begin the process to serve the following documents in the above captioned matter. The original and one copy of the Request for Entry of Default Judgment was filed with the Clerk of the Court, Untied States District Court for the District of New Jersey, Clarkson S. Fisher U.S. Courthouse, 403 East State Street, Trenton, N.J., 08608; a true copy of the same pleadings was served on defendant Demetrius Minor, #494475E, Edna Mahan Correctional Facility, 30 County Route 513, Clinton, N.J., 08809; a true copy of the documents was served upon Carlos Martinez, address 550 JERSEY AVE, C/O DO HIL NEW BRUNSWICK, N.J., 08903, the defendants who are in default in this action.

Service was made by way of First Class U.S. Mail from the Edna Mahan Correctional facility, 30 County Route 513, Clinton, N.J., 08809, the plaintiffs' present place of confinement.

Pro Se Plaintiff

Jennier Pasquarello - # 558110E Edna Mahan Correctional Facility 30 County Route 513 P.O. Box 4004 Clinton, N.J., 08809



CLERK OF THE COURT UNITED STATES DISTRICT COURT CLARKSON S. FISHER U.S. COURHOUSE 402 EAST STATE STREET TRENTON, N.J., 08608